

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

STATE OF ARIZONA, *et al.*,
Plaintiffs,

v.

MERRICK GARLAND, *et al.*,
Defendants.

No. 6:22-CV-01130

Judge David C. Joseph

Magistrate Judge Carol B. Whitehurst

DECLARATION OF JOSEPH SCOTT ST. JOHN

I, Joseph Scott St. John, declare as follows under 28 U.S.C. § 1746:

1. I am a Deputy Solicitor General for the Louisiana Department of Justice, Office of the Attorney General. I am counsel for the State of Louisiana in this action. I am over the age of 18, and I have personal knowledge of the facts contained in this Declaration. I could competently testify to the contents of this Declaration, and I would competently testify to the contents of this Declaration if called to do so.

2. I have requested from the federal defendants information about the identities of asylum applicants and asylees residing in Louisiana or Florida.

3. The federal defendants informed me that the federal defendants would not be producing documents sufficient to identify the identities of asylum applicants and asylees in Louisiana or Florida.

4. Attached as Exhibit A is a true and accurate copy of email correspondence between counsel for the Rozas Firm and myself.

5. Attached as Exhibit B is a true and accurate copy of email correspondence between the registered agent for Immigration Services and Legal Advocacy and myself.

6. Attached as Exhibit C is a true and accurate copy of a letter I sent to counsel for Home is Here NOLA, Immigration Services and Legal Advocacy, and Louisiana Advocates for Immigrants in Detention.

7. Attached as Exhibit D is a true and accurate copy of the transcript of the July 28, 2022 deposition of United States Border Patrol Chief Raul Ortiz in Case No. 3:21-CV-1066 in the United States District Court for the Northern District of Florida, Pensacola Division.

8. Attached as Exhibit E is a true and accurate copy of an opposition to a motion for protective order filed in Case No. 3:17-CV-02366-BAS-KSC in the United States District Court for the Southern District of California by, among others, the Center for Constitutional Rights.

9. Attached as Exhibit F is a true and accurate copy of a press release posted on the website of the Center for Constitutional Rights.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF LOUISIANA AND UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in New Orleans, Louisiana, this 31st day of March, 2023.

/s/ Joseph Scott St. John
JOSEPH SCOTT ST. JOHN
Deputy Solicitor General